

## PRIVACY POLICY

Respecting the right to the protection of personal data and the right to privacy is one of the fundamental missions of GSP TRAINING SRL.

Thus, we take all the necessary steps to process your personal data in accordance with the principles established by the data protection legislation applicable in Romania, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in Romania. regarding the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC ("GDPR").

Astfel, întreprindem toate demersurile necesare pentru a procesa datele dvs. personale în conformitate cu principiile stabilite prin legislația privind protecția datelor aplicabilă în România, inclusiv Regulamentul (UE) 2016/679 al Parlamentului European și al Consiliului din 27 aprilie 2016 privind protecția persoanelor fizice în ceea ce privește prelucrarea datelor cu caracter personal și privind libera circulație a acestor date și de abrogare a Directivei 95/46/CE ("GDPR").

Personal data means any information about an identified or identifiable natural person ("data subject"); an identifiable natural person is a person that can be identified, directly or indirectly, in particular by reference to an identification element, such as a name, identification number, location data, an online identifier, or to one or more many specific elements, specific to its physical, physiological, genetic, psychological, economic, cultural or social identity.

Personal data is processed by: GSP TRAINING SRL with its registered headquarters in Constanta Port, Berth 34, Constanta.

The company GSP TRAINING SRL is a personal data operator in the sense provided by the GDPR, respectively, it establishes the means and the purposes for the processing of personal data.

- What kind of personal data do we process?
- Personal data of minors
- Special data
- For what purpose and for what purpose do we process your personal data?
- To whom do we transmit your personal data?
- Do we collect personal data from third parties?
- Do we transfer your data outside the EU / EEA?
- Providing you with the personal data of other natural persons
- How long do we keep your personal data?
- What are your rights?
- Is your data secure?
- Links to other websites
- Questions or complaints
- Policy changes

## **WHAT PERSONAL DATA DO WE PROCESS?**

### **If you are a customer or a potential customer**

We collect personal data as a result of most interactions with you, as well as other aspects of our business. The categories of data we process are the following:

- a) data necessary for legitimating employment (where applicable);
- b) bank card details (card type, credit / debit card number, cardholder name, expiration date and security code);
- c) information about the vehicles that you can bring to our property, for example, registration number;
- d) data collected from the access cards (time of entry and exit);
- e) data needed to provide additional services, as the case may be;
- f) any other types of information you choose to provide to us.

Also, the surveillance cameras and other security measures on our properties can capture or record images of guests in public places (such as entrances to GSP TRAINING SRL, parking or hallways), as well as your location data (through images captured by surveillance cameras).

You can choose at any time what personal data you want to provide to us. However, if you choose not to provide certain personal data, if the basis of our request is compliance with a legal obligation, contractual obligations or obligations required to conclude a contract we will be unable to provide you with certain services.

### **If you are a potential employee**

We collect the information from the CV sent by you as well as any other information transmitted along with the CV and / or during the interviews you presented.

### **If you are a visitor to our location**

We collect the name, first name, serial number and ID number.

Surveillance cameras can also capture or record images of visitors in public places (such as entrance halls, hallways, etc.).

### **If you are a user of our website <http://gsptrainingcenter.com/>**

In order to read the information existing on the site it is not necessary to provide personal data. However, for the purpose of the technical exploitation of the portal, we collect the time and date of accessing the website and the IP address from which our website was accessed.

Some personal data is required for the use of services. For details, please refer to the section corresponding to the operation used on the site.

### **If you are a representative or contact person of our suppliers or business partners**

We collect the name, first name, position, and any other data provided by you or the company you represent.

## **If you are employed**

Please read the confidentiality policy for employees, made known at the time of employment and available at any time at the Human Resources Department.

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## **PERSONAL DATA OF THE CHILDREN**

We protect the confidentiality of data obtained from children under 16 years. If you are under the age of 16, you must obtain the consent or authorization of the parents or guardian for any provision of personal data.

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## **SPECIAL DATA**

The term "special dates" refers to racial or ethnic origin, political opinions, religious confession or philosophical beliefs or membership of unions and the processing of genetic data, biometric data, health data or sex life data or sexual orientation.

Generally, we do not collect special information unless you want to provide it to us.

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## **FOR WHAT PURPOSE AND WHAT IS THE BASIS WE PROCESS YOUR PERSONAL DATA?**

### **If you are a client**

- a) In the case of requests for offers sent by you for certain organized events or that can be organized.

*Purpose:* to respond to requests for offers sent by you.

*Basis:* signing a contract

- b) *Marketing:*

*Purpose:* We process your personal data for marketing purposes, such as business newsletters and marketing communications on new products and services or other offers that we believe may be of interest to you.

*The theme:* we base our legitimate interest in promoting our services by submitting offers that we consider to be of interest to you (see "Right to Opposition" in the "Your Rights" section)

If necessary, in accordance with applicable law, we will obtain your consent before processing your personal data for direct marketing purposes. In this case, we inform you that you will be able at any time to withdraw your consent for processing for marketing purposes, in which case you will no longer receive any marketing communication from us.

Also, when organizing certain events, it is possible to take some pictures, and some of them could be distributed in the online environment. In any case, because we take into account your right to privacy, we will do our best to keep you informed that photographs will be taken (for objections to our photographs see "Right to Opposition" in The section "Your rights").

- c) *Analysis, improvement and research:*

*Purpose:* To constantly ensure the qualitative evolution of our services, we take care to analyze each complaint / suggestion from you, so that we compile statistical reports to identify problems and find the best solutions to solve them.

The bottom line: we rely on our legitimate interest in providing services that meet your standards.

### **If you are a visitor to our location**

*Purpose:* We process your personal data to ensure the protection of property and persons within the premises.

*The basis:* our legitimate interest in ensuring the protection of the goods of customers and staff.

### **If you are a user of our website <http://gsptrainingcenter.com/>**

*Purpose:* traffic monitoring to identify errors and / or any other malfunction of the site.

*Basis:* we base this activity of data processing on our legitimate interest, that is to make available to you a fully functional site by repairing any error, as well as by its continuous improvement.

### **If you are a representative or contact person of our suppliers or business partners**

*Purpose:* developing contractual relations with our suppliers or business partners.

*Basis:* execution of a contract.

### **If you are a potential employee**

*Purpose:* evaluating your employment application.

*Basis:* signing a contract.

### **If you are employed**

Please see *the confidentiality policy for the employees*, made known at the time of employment and available at any time to the human resources department.

**For all the above categories**, we can process your data in the context of the following activities:

#### *a) Restructuring, internal reorganization or sale of assets or shares / shares:*

*Purpose:* We process your data for the above operations.

*The theme:* the legitimate interest to carry out the operations, especially in the conditions in which they would be impossible to achieve without the processing of your data.

However, we assure you that this eventual processing will be carried out in accordance with this policy and through the implementation of a measure that will ensure the confidentiality of your data.

#### *a) Security:*

*Purpose:* we process personal data for the security of goods and persons within the premises.

*Basis:* we rely on our legitimate interest in ensuring your protection.

b) *Legal reasons:*

*Purpose:* in certain cases, we must process the information provided, which may include personal data, to resolve legal disputes or complaints, to investigate and comply with applicable legal regulations, to implement an agreement or to comply with requests from the bodies public to the extent that these requests meet the conditions required by law.

*Basis:* the reasons for the processing may be represented by the legal obligation (if we have the legal obligation to disclose certain personal data to the public authorities) or of our legitimate interest in resolving any disputes and / or complaints.

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## **TO WHAT PEOPLE WE TRANSMIT YOUR DATA PERSONAL?**

Your data may be transmitted to:

a) *Providers:* in order to provide the requested services, in some cases, we will have to pass on some of your personal data to the suppliers, and they have the power of attorney and process the data on behalf, in accordance with our instructions (such as accreditation bodies, software providers, IT, accounting services, medical services).

b) *Business partners:* in some cases, we partner with other companies to provide you with products, services or offers.

The confidentiality of your data is important to us, which is why, where possible, the transmission of personal data in accordance with the above is done solely on the basis of a confidentiality commitment from the recipients, which guarantees that this data is kept and that the provision of this information is made in accordance with the legislation in force and the applicable policies. In any case, each time we will send to the recipients only the information strictly necessary to achieve that purpose.

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## **DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE EU/EEA?**

We may transfer your data to some providers based in countries other than you and, in some cases, countries outside the EU / EEA.

Although data protection laws in these countries may differ from those in your country, we will take the necessary steps to ensure that your personal data is processed in accordance with this policy and in accordance with applicable law.

## **SUPPLYING BY YOU OF THE PERSONAL DATA OF OTHER PERSONS**

If you provide us with the personal data of other individuals, please let us know prior to this disclosure and how they will be processed as described in this privacy policy.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Your personal data is kept for the entire period of achieving the purposes detailed in this policy, if a longer period of storage time is not required or permitted by applicable law.

We constantly review the need to keep your personal data, and to the extent that processing is no longer required and there is no legal obligation to keep your personal data, we will delete /

destroy your personal information as soon as possible and in a way that they can no longer be recovered or reconstituted (for example, we will delete / destroy all the data of the persons who were not hired as a result of the interviews, if there is no serious prospect of employment in the future).

If personal information is printed on paper, it will be destroyed in a way that ensures it is completely erased, and if it is saved on electronic media, it will be deleted by technical means to ensure that the information can no longer be stored, be recovered or restored later.

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## WHAT ARE YOUR RIGHTS?

As the data subject you benefit from the following rights provided by the GDPR:

*a) Right of access:* you can request (i) a confirmation of whether or not personal data are processed and, if so, access to that data and information about them, and (ii) a copy of your personal data we hold (art. 15 of the GDPR);

*b) The right to rectification:* you can inform us of any modification of your personal data or you can ask us to correct the personal data we hold about you (art. 16 of the GDPR);

*c) The right to delete ("the right to be forgotten"):* in certain situations (such as (i) if the data were collected illegally, (ii) the deadline for storing the data has expired, (iii) v- you have exercised the right to oppose or (iv) the processing of the data is done on the basis of consent and you have withdrawn your consent), you can ask us to delete the personal data we hold about you (art. 17 of the GDPR);

*d) The right to restrict the processing:* in certain situations (such as if the accuracy of this data is challenged or the legality of the processing), you may ask us to restrict the processing of your data for a certain period (art. 18 of the GDPR);

*e) The right to data portability:* ask us to send your personal data to a third party or directly to you (art. 20 of the GDPR);

*f) The right to opposition:* in certain situations (such as processing that has a legitimate interest in the legal basis), you can ask us not to process your data anymore (art. 21 of the GDPR).

*g) If we use your personal data based on your consent, you have the right to withdraw this consent.*

If we use your personal data based on your consent, you have the right to withdraw this consent at any time. In this case, your data will no longer be processed by us, unless a legal provision obliges us to keep and archive them. In any case, we will inform you if there is such a legal provision and we will expressly indicate it.

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## IS YOUR PERSONAL DATA SAFE?

We treat your personal security seriously, which is why we take important security measures necessary to protect against unauthorized access to data or unauthorized alteration, disclosure

or destruction of data. This involves internal reviews of data collection, storage and processing practices and security measures, as well as physical security measures to protect against unauthorized access to systems where we store personal data.

We also ask our service providers as well as business partners to take all necessary measures to protect against unauthorized access to data or to modify, disclose or destroy unauthorized data.

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## **LINKS TO OTHER WEBSITES**

Our site contains links to third party sites. Please note that we do not take responsibility for the collection, use, storage, sharing or disclosure of data or information by such third parties. If you use or provide information on the websites of third parties, the terms and privacy policy of those websites apply. We advise you to read the privacy policy of the sites you visit before submitting personal data.

The use of the Internet services offered by GSP TRAINING SRL is subject to the terms of use and the privacy policy of the Internet providers. You can access these terms and policies by using the links on the authentication page of that service or by visiting the website of the internet provider.

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## **QUESTIONS OR CLAIMS**

If you have any questions or concerns regarding the processing of your personal data or if you would like to exercise any of the rights mentioned above, you are welcome to contact us using our contact details available on the site or by sending an email to the following address : [dpo@training.spgroup.ro](mailto:dpo@training.spgroup.ro), and we will reply you within 30 days of receiving the request.

Also, as long as you do not have electronic means or do not want to use them, you can make a written request that you submit to the registered office of Constanta, Constanta County.

To the extent that you are not satisfied with the way your request was resolved, you can file a complaint with the National Supervisory Authority for Personal Data Processing.

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## **POLICY CHANGES**

This privacy policy may be modified in accordance with changes to the data policy legislation or based on changes in our services or organizational arrangements from time to time. If we make material changes to it, we will post a link to the revised policy on the homepage of our site. If we make significant changes that will have an impact on your rights and freedoms (for example, when we begin processing your personal data for purposes other than those specified above), we will contact you prior to commencing this processing.

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